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AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
DEPUTY



09-CV-01505-MEM

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT H. PRICE, MD,

Defendant.

NO. **C09-1505**

COMPLAINT

The United States of America, by and through Jeffrey C. Sullivan, United States Attorney for the Western District of Washington, and Anastasia D. Bartlett, Assistant United States Attorney, for its Complaint against the Defendant alleges:

I

Jurisdiction is conferred upon this Court pursuant to Title 28, United States Code, Section 1345.

II

The Defendant resides within the Western District of Washington.

NO FEE REQUIRED - GOV'T AGENCY

## III

The Defendant applied for and was granted a scholarship award and continuing scholarship award through the National Health Service Corps ("NHSC") Scholarship Program within the U.S. Public Health Service, Department of Health & Human Services, as authorized under 42 U.S.C. § 2541 et seq. Said scholarship awards are more particularly set out in the Certificate of Indebtedness, attached hereto as Exhibit 1. Copies of the NHSC application and scholarship contracts are attached hereto as Exhibits 2 and 3.

## IV

Although demand has been made for payment, there remains due and owing under the scholarship awards the principal sum of \$93,857.19; administrative/collection costs of \$.00; plus \$35,361.17 interest, as of March 9, 2009; and interest continues to accrue on the principal sum of \$93,857.19 at 8.00% per annum (\$20.58 per day) . See Exhibit 1.

## V

In addition to the amounts set forth above, the United States of America is entitled to have and recover reasonable attorneys fees from the Defendant.

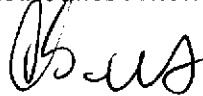
WHEREFORE, the United States demands judgment against Defendant as follows:

1. Principal in the amount of \$93,857.19; administrative/collection costs of \$.00; and interest in the amount of \$35,361.17 accrued through March 9, 2009;
2. Interest to continue to accrue on the \$93,857.19 principal at the rate of 8.00% per annum (\$20.58 per day) from March 10, 2009 until paid in full or until date of judgment;
3. Interest on the total judgment amount from the date of judgment at the legal rate in effect on the date of judgment, computed daily and compounded annually, until paid in full, pursuant to U.S.C. §§ 1961;
4. Reasonable attorney's fee;
5. Costs of suit;
6. Filing fee of Three Hundred Fifty Dollars (\$350.00) pursuant to 28 U.S.C. § 2412(a)(2);
7. Docket fees of Twenty Dollars (\$20.00) pursuant to 28 U.S.C. § 1923(a); and

1  
2 8. Such other relief as this Court may deem just.  
3

4 DATED this 21 day of October 2009.

5 JENNY A. DURKAN  
6 United States Attorney

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8 ANASTASIA D. BARTLETT  
9 Assistant United States Attorney  
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